

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: LAMONTE S. OWENS

Chapter 13
Bky. No. 15-11627-ELF

MOTION OF DEBTOR LAMONTE S. OWENS TO
SHORTEN TIME

Debtor, LAMONTE S. OWENS, hereby move this honorable court to re-open the Chapter 13 bankruptcy case that was dismissed on December 8, 2015 avers as follows:

1. First and foremost, it should be noted debtor is not looking to reopen this specific case for any purpose only to be permitted to file a new Chapter 7 case so he can finally get a fresh start that he has been trying to get for years.
2. A new shutoff notice has been scheduled for September 16, 2016 that Mr. Owens is seeking to avoid by filing a new Chapter 7 case.
3. The immediate case was initially filed on March 9, 2015.
4. Further, Debtor did file two previous bankruptcies before this one.
5. On July 17, 2015 at the 341 meeting of creditors, a consent order was signed stating that “this case is dismissed for any reason, debtor shall be prohibited from filing individually or jointly, any subsequent bankruptcy case without further leave of Court.”
6. The case then in fact was dismissed over a year later on July 19, 2016.
7. The debtor is not, in fact seeking to reopen the case for any reason only for permission to file a Chapter 7 bankruptcy.

8. This case initially started off as many things for Mr. Owens, but eventually it became a vessel to attempt to modify his remaining mortgages on his two properties.
9. Both of those properties have since been modified.
10. As such, Mr. Owens is now seeking to file a Chapter 7 to clear up the remaining debt in his name and to finally get a fresh start he has been striving to achieve for years..
11. Without the requested relief, Debtor will suffer irreparable injury since he would suffer even further by being forced to repay debts which he otherwise is unable to afford and could even lose his home.

WHEREFORE, Debtor respectfully request this Court to issue an Order re-instating Debtor' bankruptcy case pursuant to bankruptcy rule 5010 and 11 U.S.C. §350 (b) and allow Debtor to file all of their necessary documentation as soon as the court sees fit.

Dated: September 13, 2016

By: /s/ Joshua L. Thomas
Joshua L. Thomas, Esq.

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CERTIFICATE OF SERVICE

I, Joshua L. Thomas, Esq., do hereby certify that on September 13, 2016, service of a true and correct copy of the attached pleadings, and attachments thereto, was delivered by first class mail and/or electronic filing to the below named interested parties in Exhibit A.

Date: September 13, 2016

By: /s/ Joshua L. Thomas
Joshua L. Thomas, Esq.